

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

NETCHOICE, LLC d/b/a	*	
NetChoice, a 501(c)(6)	*	
District of Columbia	*	
organization, COMPUTER &	*	
COMMUNICATIONS INDUSTRY	*	
ASSOCIATION d/b/a CCIA, a	*	
501(c)(6) non-stock	*	CIVIL ACTION
Virginia Corporation,	*	NO. 1:21-cv-00840-RP
Plaintiffs,	*	
	*	
v.	*	
	*	
KEN PAXTON, in his	*	
official capacity as	*	
Attorney General of Texas,	*	
Defendant.	*	

VIDEOTAPED ORAL DEPOSITION

OF

STACIE D. RUMENAP,

PRESIDENT AT STOP CHILD PREDATORS

Friday, November 12, 2021

(Remotely Reported)

VIDEOTAPED ORAL DEPOSITION OF STACIE D.

RUMENAP, produced as a witness at the instance of the Defendant, and duly sworn, was taken in the above-styled and numbered cause on Friday, November 12, 2021, from 12:01 p.m. to 1:35 p.m., before Debbie D. Cunningham, CSR in and for the State of Texas, remotely reported via Machine Shorthand, pursuant to the Federal Rules of Civil Procedure.

<p>1 APPEARANCES</p> <p>2</p> <p>3 FOR PLAINTIFFS:</p> <p>4 LEHOTSKY KELLER</p> <p>919 Congress Avenue, Suite 1100</p> <p>5 Austin, Texas 78701</p> <p>6 By: Todd Disher, Esq.</p> <p>todd@lehotskykeller.com</p> <p>7 AND</p> <p>Jeremy Maltz, Esq.</p> <p>8 jeremy@lehotskykeller.com</p> <p>9</p> <p>10 FOR DEFENDANT:</p> <p>11 OFFICE OF THE ATTORNEY GENERAL OF TEXAS</p> <p>General Litigation Division</p> <p>12 P.O. Box 12548</p> <p>Austin, Texas 78711-2548</p> <p>13 (T) 512.463.2120</p> <p>By: Benjamin Walton, Esq.</p> <p>14 benjamin.walton@oag.texas.gov</p> <p>AND</p> <p>15 Courtney Corbello, Esq.</p> <p>courtney.corbello@oag.texas.gov</p> <p>16</p> <p>17</p> <p>18 VIDEOGRAPHER:</p> <p>19 Brian Christopher</p> <p>20</p> <p>21</p> <p>22 --ooOoo--</p> <p>23</p> <p>24</p> <p>25</p>	<p>2</p> <p>4</p> <p>1 EXHIBIT INDEX</p> <p>2 Exhibit Number Description Page</p> <p>3 Exhibit 1 Rumenap Declaration 23</p> <p>4 Exhibit 2 House Bill 20 53</p> <p>5</p> <p>--ooOoo--</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>3</p> <p>1 INDEX</p> <p>2 APPEARANCES 2</p> <p>3</p> <p>4 EXAMINATION OF STACIE D. RUMENAP:</p> <p>5 BY MR. WALTON 6</p> <p>6 BY MR. DISHER 52</p> <p>7 BY MR. WALTON 53</p> <p>8</p> <p>9</p> <p>10 REPORTER'S CERTIFICATION 59</p> <p>11</p> <p>12 --ooOoo--</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>5</p> <p>1 (Friday, November 12, 2021, 12:01 p.m.)</p> <p>2 P R O C E E D I N G S</p> <p>3 THE REPORTER: Today's date is Friday,</p> <p>4 November 12, 2021. The time is 12:01 p.m. Central</p> <p>5 Standard Time. This is the videotaped oral deposition</p> <p>6 of Stacie Rumenap, President of Stop Child Predators;</p> <p>7 and it is being conducted remotely. The witness is</p> <p>8 located in Washington, DC.</p> <p>9 My name is Debbie Cunningham, CSR</p> <p>10 Number 2065. I am administering the oath and reporting</p> <p>11 the deposition remotely by stenographic means from</p> <p>12 Austin, Texas.</p> <p>13 Would Counsel please state their</p> <p>14 appearances and locations for the record, beginning with</p> <p>15 Plaintiffs' Counsel?</p> <p>16 MR. DISHER: Yes. This is Todd Disher.</p> <p>17 I am in Washington, DC; and I have Jeremy Maltz with me</p> <p>18 today, who is in Falls Church, Virginia.</p> <p>19 MR. WALTON: This is Ben Walton for the</p> <p>20 Defendant. I am from the Attorney General's Office. I</p> <p>21 am physically present in Austin, Texas. With me is also</p> <p>22 Courtney Corbello, who is also physically present in</p> <p>23 Austin, Texas.</p> <p>24 *</p> <p>25 *</p>

<p>6</p> <p>1 STACIE RUMENAP, 2 having been duly sworn, testified as follows: 3 EXAMINATION 4 BY MR. WALTON: 5 Q. Could you please state your name for the 6 record? 7 A. Stacie Rumenap. 8 Q. Is it Rumenap or "Rumenap"? 9 A. "Rumenap." My father used to always say: You 10 take a shot of rum, and then you need a nap. "Rumenap." 11 Q. Okay. I love it. I got it. Okay. That's a 12 great way to start a Friday afternoon. 13 So, Ms. Rumenap, have you ever given a 14 deposition before? 15 A. I have not. 16 Q. Okay. All right. Well, welcome to the 17 wonderful world of depositions. I'm sure that your 18 attorney has probably gone over some of the basic ground 19 rules with you; but I want to go ahead and voice a few 20 of those ground rules, just so we make sure we're all 21 operating from the same set of expectations here. 22 So, first of all, you understand that 23 you've just been placed under oath; and that obligates 24 you to tell the truth just as if you were in front of a 25 live courtroom with a judge and a jury. Do you</p>	<p>8</p> <p>1 that will help keep things clean for the court reporter. 2 Does that sound fine to you? 3 A. Yes. 4 Q. Okay. If at any point you don't understand my 5 questions today, please do ask me to clarify because I 6 want to make sure that we're not talking past each 7 other. I want to make sure that we're both on the same 8 page and we're understanding one another clearly so that 9 we can actually be efficient and productive today. So 10 if I ask something and you're not sure, just ask me to 11 clarify; and I'll be happy to work with you and make 12 sure we're on the same page. Okay? 13 A. Yes. 14 Q. And then if at any point you would like to 15 take a break, you are more than welcome to do so. If 16 I've asked a question, then after you've answered the 17 question, you can simply say, "Hey, I'd like to take a 18 break now," and we will do that. All right? 19 A. Okay. 20 Q. Let's see. So getting that out of the way, my 21 first question for you is: What did you do to prepare 22 for your testimony here today? 23 A. So I have 15 years experience in child safety 24 advocacy, so I thought through a lot of what I have 25 learned through those 15 years. I read through my</p>
<p>7</p> <p>1 understand that? 2 A. I do. 3 Q. And the court reporter, Ms. Cunningham, is 4 taking down everything that is said; but she's not 5 taking down all of our, you know, body language. So if 6 you're going to answer a question or respond to a 7 question, please do so verbally instead of simply by 8 head motions, using words like "yes" or "no" that will 9 appear clearly on a transcript so that we actually have 10 a written record of our dialogue today. Is that all 11 right? 12 A. Yes. 13 Q. And on that note, since the court reporter is 14 taking down everything that's being said. It makes her 15 job a lot easier if only one person is talking at a 16 time. So I will try to not interrupt. I know sometimes 17 there are pauses and glitches due to the remote format; 18 but I will do my best not to interrupt you and to let 19 you finish answering a question before I jump in with 20 another one. But if at any point I do that 21 inadvertently, then, please, you know, do something to 22 signal at me to let me know that I did interrupt you; 23 and I will stop speaking and let you finish whatever it 24 is you're saying. And then, if you would wait for me to 25 finish asking my question before you start answering,</p>	<p>9</p> <p>1 declaration, which I have in front of me. I pulled the 2 New York Times article which I sourced in the 3 declaration; and, of course, I talked to my attorney, 4 Todd. 5 Q. Okay. Other than your attorney, did you talk 6 to anybody else as part of preparing for your deposition 7 today? 8 A. No. 9 Q. Okay. Other than that, other than your 10 declaration and the New York Times article you 11 mentioned, did you review any other documents in 12 preparation for your deposition today? 13 A. No -- well, sorry. The bill, HB 20, I guess. 14 Q. Okay. 15 A. Right, yes. 16 Q. All right. All right. That's a good 17 clarification. 18 And then, outside of those documents, 19 along with the bill, the text of HB 20 itself, are there 20 any other documents that you looked at to get ready for 21 today? 22 A. I did not. 23 Q. Okay. I guess before we get into your 24 declaration, which is where I want to spend most of our 25 time, asking you about that declaration; but before we</p>

<p>10</p> <p>1 get into that, can you give me a brief description of 2 your history with Stop Child Predators? How did you get 3 involved with that organization? 4 A. So almost 20 years ago, I was approached by a 5 law professor, who I knew, who had come out of the 6 Department of Justice. He was an Assistant Attorney 7 General under General Ashcroft, so quite some time ago. 8 He was starting a law firm. He was a professor at 9 Georgetown Law. He was also starting his own law firm, 10 and he was approached by a client of his to start a 11 child safety organization. 12 And the premise behind the client, who 13 had no recollection about any of these laws or this 14 issue, he and his wife had six children of their own. 15 And he had watched in 2005 the horrific story play out 16 on national media around Jessica Lunsford; and Jessica 17 was a nine-year-old girl in Florida who was abducted by 18 a twice-convicted sex offender and was captured, raped 19 repeatedly, kept alive for about three days, and 20 ultimately buried alive. And the story just received a 21 tremendous amount of attention. 22 Cary and his wife were living in 23 California at the time and had become successful in the 24 college loan industry; and they decided: You know, if 25 something like this had happened to one of our six</p>	<p>12</p> <p>1 laws really on the books that dealt with tough penalties 2 or electronic monitoring of sex offenders. That 3 technology itself in the criminal justice system was 4 very new and controversial, as are mandatory sentences; 5 but they felt like when you looked at this story and the 6 case out of Florida in the Lunsford case, the system and 7 the laws that had been on the books had really failed 8 this family. And so they thought if we started this 9 organization around this idea of passing Jessica's Law, 10 which would deal with mandatory sentencing and 11 electronic monitoring, we thought if we passed this law 12 around the country, that that would solve our problem. 13 And we really were naive at the time to 14 think that that would solve our problem; but that's how 15 we started the organization, with the sole mission of 16 passing this law, state by state. And so we teamed up 17 with Mark Lunsford, Jessica's father. I pitched him, 18 saying: You know, listen, your story has really 19 affected a whole group of us; and we have this very 20 small nonprofit that we want to make a difference. And 21 I don't know -- at that time, you know, I was telling 22 him I didn't know a lot about child safety; but I knew 23 how to pass bills and I knew how to organize and build 24 coalitions. And so I made a commitment to him that if 25 he would trust me and he would join forces with us, we</p>
<p>11</p> <p>1 children, our lives would be destroyed. We wouldn't 2 know what to do. 3 And so they decided they were going to 4 take some of the success that they had and start their 5 own group and they looked around at places like 6 National Center for Missing and Exploited Children to 7 see if they could have an impact there, but they felt 8 like NCMEC is -- was and still is a well-oiled machine 9 and doing incredible work. And what they wanted to do 10 was something a little more scrappy. They wanted a 11 small organization that they felt like they could really 12 see the impact. 13 And when they talked to this law 14 professor, whom I knew, he said: Well, listen, I'm 15 starting this law firm and I'm teaching and I, you know, 16 just came out of DOJ and I'm doing all these things. I 17 can't take on this project, but I know this woman and 18 let me see if she would be interested in taking it on. 19 And so we sat down and they had already started the 20 entities, just from a legal perspective, the (c)(3) and 21 the (c)(4) entities; but they hadn't figured out what to 22 do with the organization. 23 And so a group of us got together and 24 said: Well -- again, this is 2005; now we're going into 25 early 2006. And at that time there weren't a lot of</p>	<p>13</p> <p>1 would take what he was trying to do in Florida -- Texas 2 was an early adopter of Jessica's law -- what he was 3 trying to do in Florida and Texas and we would take it 4 across the country and his daughter's death would not be 5 in vain. And so we teamed up, and we did that. 6 To this day he is still just an 7 incredible friend and mentor and advisor, an incredible 8 person that I keep in touch with. He chairs our 9 advisory board. We traveled the country together over, 10 gosh, probably a decade. We learned a lot of lessons 11 along the way. 12 We learned the art of compromise. You 13 know, in the early days we said: Absolutely not. If 14 it's not 25 years to life, we won't accept it. And we 15 sort of learned along the way that, all right, maybe we 16 can start with 20 years; maybe we can start with a 17 second offense, you know. 18 And so we really built out, through Stop 19 Child Predators and through Mark, a coalition where we 20 brought other victims in to tell their stories to the 21 media and to lawmakers in an effort to make change. 22 We talked to law enforcement a lot 23 because what we were finding, especially at the state 24 level, is we were asking law enforcement to enact these 25 sentences or be part of the process on these long</p>

<p>14</p> <p>1 sentences and the electronic monitoring aspects; but no 2 one was actually getting their input of was it possible, 3 was it enforceable, what would that look like from a 4 criminal justice perspective. 5 And so we really built a big coalition 6 at the state and local levels to rally support and 7 pass these laws. We have passed Jessica's Law in 46 8 states -- technically all 50, but we -- 47 -- there's a 9 couple, New York being one of them, that we say doesn't 10 go quite far enough. Even though we've learned to 11 compromise, it doesn't go quite far enough. But for the 12 most part, we've been able to pass this law across the 13 country. 14 During that time period, because we had 15 the platform and the ability to share these stories, we 16 started working with other victims as well. Jessica -- 17 or -- I'm sorry -- Jenna Quinn down in Texas is a great 18 example. I don't know if you've ever come across her; 19 but she has a bill, a law, called Jenna's Law that we've 20 worked closely with her on over the years which really 21 focuses on educating educators and people in the school 22 system who have interaction with kids about detecting 23 and trying to prevent signs of abuse. 24 We've teamed up with Erin Runnion out in 25 California and Marc Klaas out in California to look at</p>	<p>16</p> <p>1 AOL and CompuServe and, you know, companies that you 2 just don't really hear about these days. 3 And what we were doing is we were really 4 looking at: Okay. What is possible in the technology 5 space, and what could we be doing to try to get ahead of 6 these bad actors that were going to try to use this very 7 cool, new innovation and, you know, how were they going 8 to use it to harm children. 9 And so we started looking at bills like 10 cyberbullying, which was pretty new. The first case was 11 a My- -- you know, if you remember that case of MySpace 12 out of Missouri, if I remember correctly, where an adult 13 woman actually got involved with her teen daughter and 14 her teen daughter's -- like, one of her good friends, 15 they had a falling out; and the mom was bullying this, 16 like, twelve-year-old girl, who ultimately ended up 17 committing suicide. 18 And people were saying: Well, our laws 19 don't keep up with -- some law was broken. What do we 20 do with this? And in the end, it ended up being 21 litigated out of California because MySpace was housed 22 in California, although this issue was in Missouri; 23 and what they ended up prosecuting the mom on was terms 24 of -- terms and condition, right, breaking the terms and 25 conditions of use of service.</p>
<p>15</p> <p>1 different laws and child safety initiatives there. And 2 once we started doing this early on in the original 3 days, we realized, you know, one, we were very naive to 4 think we could pass this one law and that would change 5 things; hence, why we started getting involved in other 6 laws. 7 But, two, we really realized this problem 8 was much bigger than just what was happening in the real 9 world; and by 2008, 2009, and 2010 -- it's hard to 10 believe now -- but, you know, the internet was still 11 pretty new. And talking about what was going on and the 12 impact it had to children and to families and to 13 communities around safety was still pretty new 14 conversation. Parents didn't grow up at that time with 15 a smartphone, with the technology, with social media 16 platforms. 17 And so we took the same type of energy 18 and process that we put into passing Jessica's Law and 19 Jenna's Law and different laws in the real world, and we 20 started applying them to the internet space. It was 21 then that we started reaching out to corporate partners 22 and people who -- you know, again, Facebook was new. 23 Google wasn't what it was -- what it is today. I'm not 24 even sure if I can remember if Apple was even on the map 25 at that point in these very early conversations. It was</p>	<p>17</p> <p>1 So -- but all of this, again, was just 2 brand-new; and I tell that to show that we didn't know 3 what we know now. And we were trying to figure out how 4 to get ahead of some of these internet safety issues, 5 luring, grooming, sharing of -- then it was called child 6 pornography -- these images of children, that a lot was 7 being done through peer-to-peer communications and being 8 done in sort of the dark -- early days of the dark web. 9 And so we started talking to educators. 10 We worked with some Attorneys General over the years. 11 We went into schools. A lot of what we saw in those 12 early days was the AG's Office was partnering with 13 school systems to actually teach internet safety in the 14 schools and working together. And so we went down to 15 Florida, where then it was Bill McCollum, again, a very 16 long time ago; but we -- I can't remember if we came to 17 Texas. We went out to California. We went to North 18 Carolina. We were up in Pennsylvania and Ohio, anywhere 19 who would take us, really, right? 20 We were just putting information out and 21 trying to say: Hey, we want to do these trainings, 22 especially for parents because parents didn't really 23 know exactly what their kids were doing online; and they 24 didn't understand the capabilities of the internet. 25 And, you know, when they were handing their kid a phone,</p>

<p>18</p> <p>1 they didn't necessarily understand the power that that 2 phone had. It wasn't just making phone calls, but it 3 was a way to play games. It was a way to get onto 4 social media. It was a way to connect with one another. 5 And so those early days is what launched 6 us into this internet safety space and really 7 collaborating with other nonprofits and advocacies, law 8 professors, industry, lawmakers, and law enforcement; 9 that has taken us all the way through to today. 10 Q. So -- 11 MR. DISHER: Stacie, let me -- sorry, 12 Ben. So Debbie doesn't, you know, come through the 13 computer and strangle me, I would just ask if you could 14 just slow down just a little bit. 15 THE WITNESS: Sorry. 16 MR. DISHER: She's trying -- I know she's 17 getting -- 18 THE WITNESS: Sorry, Debbie. 19 MR. DISHER: I know she's getting all of 20 what you're saying; but, you know, if we go for two 21 hours like that, her fingers might catch on fire. 22 THE WITNESS: Noted. 23 Q. (BY MR. WALTON) Thank you, Ms. Rumenap, that 24 was helpful, a helpful overview. 25 At this point, you know, what laws are</p>	<p>20</p> <p>1 Section 230, I'm kind of curious what is SCP -- by the 2 way, when I say "SCP," I will be referring to Stop Child 3 Predators, the organization of which you are the 4 President. Do you understand that? 5 A. Yes. 6 Q. Okay. So SCP, does it have a position 7 regarding Section 230? 8 MR. DISHER: Objection, form. 9 Go ahead. 10 A. Our organization has tried to bridge the 11 conversation between tech industry, lawmakers, law 12 enforcement, and child safety advocates to bring 13 awareness and education to all people involved. That 14 has been our position. 15 Q. (BY MR. WALTON) Okay. So do you take a 16 position regarding whether Section 230 is a good law or 17 a bad law? 18 MR. DISHER: Objection, form. 19 A. We believe that Section 230 is outdated and 20 that there could be some reforms, but we also believe 21 that Section 230 is valid and needed. And we don't have 22 a perfect answer of how you address the concerns around 23 Section 230. 24 Q. (BY MR. WALTON) Okay. What are some of SCP's 25 concerns with Section 230 as it currently stands?</p>
<p>19</p> <p>1 out there, either that you've been involved in helping 2 to lobby for and pass; but what would you describe as 3 the state of -- you know, with this online material 4 that's dangerous to children, et cetera, and sexual 5 predators, what laws are out there? How far do they go? 6 MR. DISHER: Objection, form. 7 Go ahead and answer. 8 A. There are a lot of laws that are protecting 9 children and a lot more that needs to be done. We have 10 the laws, like, the PROTECT Act, the Adam Walsh Act, 11 Jessica's Law, which I mentioned, Erin's Law, Jenna's 12 Law, where there's a theme of so many of these laws 13 being written about abducted and missing and harmed and 14 exploited and murdered children. There's too many of 15 them, frankly. 16 There are current debates around 17 Section 230. There's certainly laws on the books around 18 child sexual abuse images. It depends if at the state 19 or federal level, but the list is very long and 20 exhaustive and I couldn't tell you every single law. 21 Q. I wasn't asking for that, just a general 22 setting of the stage, which I think you did nicely. So 23 thank you. 24 What is -- we'll go ahead and get into 25 your declaration here soon; but since you mentioned</p>	<p>21</p> <p>1 MR. DISHER: Objection, form. 2 Go ahead. 3 A. We believe that internet safety companies and 4 platforms that allow for user-generated content should 5 not be solely held responsible for the users' generated 6 content. We think that internet companies have a role 7 to play in keeping its users safe, but they are not 8 solely responsible for content on their platform. 9 Q. (BY MR. WALTON) So how would you suggest 10 updating or amending Section 230 in order to reflect 11 those concerns? 12 MR. DISHER: Objection, form. 13 A. I think that internet companies do a lot to 14 try to keep children safe and we applaud their efforts 15 in doing that and there's always more that can be done. 16 Q. (BY MR. WALTON) Do you believe that -- do you 17 believe that it would be appropriate to have affirmative 18 regulations in place requiring internet service 19 providers, platforms, et cetera, to implement specific 20 content moderation policies when it comes to CSAM and 21 other related material? 22 MR. DISHER: Objection, form. 23 A. I'm not sure I have an opinion on that. I 24 think we need internet companies to have a seat at the 25 table and work with child advocates and work with law</p>

<p style="text-align: right;">22</p> <p>1 enforcement and lawmakers to keep children safe, but I</p> <p>2 don't know the ins and outs of how you solve that</p> <p>3 problem.</p> <p>4 Q. (BY MR. WALTON) But do you believe that it's</p> <p>5 sufficient to allow the internet providers themselves to</p> <p>6 develop their own content moderation policies?</p> <p>7 MR. DISHER: Objection, form.</p> <p>8 A. I am not an expert on the individual companies</p> <p>9 and what they could or couldn't do of any one company.</p> <p>10 So I think I don't know that I'm qualified to answer</p> <p>11 that question.</p> <p>12 Q. (BY MR. WALTON) Okay. Let's say there were a</p> <p>13 social media platform that put together their own social</p> <p>14 media app or whatever they call it these days; but there</p> <p>15 was a social media company created where users could go</p> <p>16 on and post stuff and it was not moderated in any way</p> <p>17 for sexually explicit material, material that would</p> <p>18 endanger children, et cetera. Do you think that such a</p> <p>19 social media platform should be permitted to operate</p> <p>20 like that, or should they be subject to regulation that</p> <p>21 requires them to prohibit that sexually explicit</p> <p>22 material?</p> <p>23 MR. DISHER: Objection, form.</p> <p>24 A. I mean, that sounds so vague and so just sort</p> <p>25 of a pie in the sky, I don't -- I don't know how I would</p>	<p style="text-align: right;">24</p> <p>1 THE WITNESS: Oh, okay.</p> <p>2 MR. DISHER: Yeah, download the PDF; and</p> <p>3 that's going to be your declaration.</p> <p>4 THE WITNESS: Too many things open on my</p> <p>5 computer here. There we go.</p> <p>6 A. Okay. I've got it.</p> <p>7 Q. (BY MR. WALTON) Okay. And very briefly, I'm</p> <p>8 going to share my screen just so that we can make sure</p> <p>9 that we're all operating off of the same document.</p> <p>10 Let's see. Ms. Rumenap, can you see the</p> <p>11 document that I have on my screen now?</p> <p>12 A. I can.</p> <p>13 Q. Okay. And is this the same document that you</p> <p>14 just opened through the chat box from what you can tell?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Okay. And this looks like your declaration</p> <p>17 that you submitted in support of Plaintiffs' Motion for</p> <p>18 Preliminary Injunction in this lawsuit?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. I'm going to go ahead and just let each</p> <p>21 of us keep the document open and scroll through it</p> <p>22 however you'd like to, but that's the document that I'll</p> <p>23 be walking us through through most of the remainder of</p> <p>24 our time here this afternoon.</p> <p>25 First, a couple of general questions.</p>
<p style="text-align: right;">23</p> <p>1 answer that properly.</p> <p>2 Q. (BY MR. WALTON) Let's go ahead and -- I did</p> <p>3 this earlier -- so let me go ahead and send through the</p> <p>4 chat box here a copy of your declaration so that the</p> <p>5 court reporter can have it to mark it as an exhibit and</p> <p>6 we can all make sure that we're operating off of the</p> <p>7 same document as we walk through the declaration. So if</p> <p>8 you will give me just a second, I will send that.</p> <p>9 Okay. I have just sent through the chat</p> <p>10 box a document entitled 12-6 Rumenap Declaration, and I</p> <p>11 will ask the court reporter to mark that as Exhibit 1 to</p> <p>12 this deposition.</p> <p>13 (Exhibit 1 marked.)</p> <p>14 Q. (BY MR. WALTON) Ms. Rumenap, are you able to</p> <p>15 download or open that document?</p> <p>16 A. I am not, but I have it in front of me.</p> <p>17 MR. WALTON: Mr. Disher, are you able to</p> <p>18 access the document I just sent in the chat?</p> <p>19 MR. DISHER: Yes, I got it.</p> <p>20 So, Stacie, are you able to open the chat</p> <p>21 feature?</p> <p>22 THE WITNESS: I can open the chat, but</p> <p>23 it's not just opening. It's making me save a file. Is</p> <p>24 that accurate?</p> <p>25 MR. DISHER: Yes.</p>	<p style="text-align: right;">25</p> <p>1 How did you decide to submit this declaration?</p> <p>2 A. I was watching what was happening in the</p> <p>3 debate in Texas. This similar debate has come up in</p> <p>4 other states. We have followed that as well and have</p> <p>5 weighed in, and so I had an opportunity to weigh in and</p> <p>6 decided to do so.</p> <p>7 Q. In what other states have you weighed in?</p> <p>8 A. Florida. California had a bill sort of like</p> <p>9 this years ago.</p> <p>10 Q. And then you mentioned Florida. Was that more</p> <p>11 recently?</p> <p>12 A. It was.</p> <p>13 Q. Did you submit a declaration in the California</p> <p>14 case?</p> <p>15 A. No, I submitted testimony. I went and</p> <p>16 testified before the Legislature.</p> <p>17 Q. I see. Did the California Legislature end up</p> <p>18 passing the bill at hand?</p> <p>19 A. They did not.</p> <p>20 Q. Did Florida pass a roughly similar bill?</p> <p>21 A. Yes.</p> <p>22 Q. And did you submit any testimony to the</p> <p>23 Florida Legislature regarding that bill?</p> <p>24 A. I did a similar declaration to this.</p> <p>25 Q. And was that similar declaration submitted to</p>

<p>26</p> <p>1 the Legislature or to a court?</p> <p>2 A. To a court.</p> <p>3 Q. And it was submitted to a court. Was that in</p> <p>4 a lawsuit over the bill the Florida Legislature had</p> <p>5 passed?</p> <p>6 A. Yes.</p> <p>7 Q. Did you can provide any live testimony in the</p> <p>8 Florida case?</p> <p>9 A. I did not.</p> <p>10 Q. Did anyone help you draft this declaration?</p> <p>11 A. No.</p> <p>12 Q. Did you discuss this declaration with anyone</p> <p>13 else while you were preparing it?</p> <p>14 A. No.</p> <p>15 Q. All right. Let's go ahead -- let's look at</p> <p>16 Paragraph 1. We've already talked a lot about SCP, the</p> <p>17 organization that it is. So I may not have a lot of</p> <p>18 specific questions; but starting, I guess, on page 2 of</p> <p>19 the PDF file, Paragraph 1 of your declaration, are you</p> <p>20 able to see that?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. SCP, Stop Child Predators, is that</p> <p>23 organization an e-mail service provider?</p> <p>24 A. No.</p> <p>25 Q. Is it a social media platform?</p>	<p>28</p> <p>1 any social media platforms?</p> <p>2 A. Usually we're not required to disclose where</p> <p>3 our funding comes from, but I will tell you "no."</p> <p>4 Q. Okay. And then the same question: Do you</p> <p>5 receive any funding from any e-mail service providers?</p> <p>6 A. I do not.</p> <p>7 Q. Okay. Let's see. I want to jump down, for</p> <p>8 the sake of time, to Paragraph 5; and that would be on</p> <p>9 the next page, page 3 of the PDF file. But Paragraph 5</p> <p>10 in your declaration, are you able to see that paragraph?</p> <p>11 A. Yes.</p> <p>12 Q. It says that, "We work with leading online</p> <p>13 platforms." What does that refer to?</p> <p>14 A. So over our 15 years of operations, we have</p> <p>15 worked with National Center for Missing and Exploited</p> <p>16 Children. We've worked with law enforcement. And we</p> <p>17 have worked with companies like Google and Facebook to</p> <p>18 better understand the back-end operations of internet</p> <p>19 safety as it applies to sexual abuse images.</p> <p>20 Q. Okay. You talk in Paragraph 5 about</p> <p>21 developing and enforcing safety policies. So with what</p> <p>22 companies -- well, let me be more specific. Have you</p> <p>23 worked -- has SCP worked with any social media platforms</p> <p>24 to develop and enforce safety policies that prioritize</p> <p>25 children's safety?</p>
<p>27</p> <p>1 A. No.</p> <p>2 Q. Does it control or administer a social media</p> <p>3 platform?</p> <p>4 A. No.</p> <p>5 Q. And does it control or administer an e-mail</p> <p>6 service provider?</p> <p>7 A. No.</p> <p>8 Q. Have there been any conversations at SCP about</p> <p>9 any way in which SCP would be required to change any of</p> <p>10 its current operations in order to comply with HB 20 if</p> <p>11 HB 20 went into effect?</p> <p>12 MR. DISHER: Objection, form.</p> <p>13 A. No.</p> <p>14 Q. (BY MR. WALTON) As you sit here today, are</p> <p>15 you aware of any requirements that HB 20 would put upon</p> <p>16 the operations of SCP if it went into effect?</p> <p>17 A. No.</p> <p>18 MR. DISHER: Objection, form.</p> <p>19 Q. (BY MR. WALTON) How is SCP funded?</p> <p>20 MR. DISHER: Objection, form.</p> <p>21 Go ahead.</p> <p>22 A. It is funded through private donations,</p> <p>23 through foundations, most individual donors, and some</p> <p>24 industry support.</p> <p>25 Q. (BY MR. WALTON) Do you receive funding from</p>	<p>29</p> <p>1 A. We have had conversations about how best to do</p> <p>2 this, best practices, primarily at task force meetings,</p> <p>3 conferences, summits around child safety.</p> <p>4 Q. Okay. What specifically do you encourage</p> <p>5 social media platforms to do in order to enhance their</p> <p>6 safety policies for children's safety?</p> <p>7 MR. DISHER: Objection, form.</p> <p>8 A. We can't tell any one company how to run their</p> <p>9 business or what they should do. Our hope is that we</p> <p>10 can work in partnership with law enforcement, industry,</p> <p>11 and child safety advocates to put as much -- as many</p> <p>12 resources as possible behind the prevention of child</p> <p>13 exploitation.</p> <p>14 Q. (BY MR. WALTON) Okay. So SCP encourages them</p> <p>15 to put resources behind prevention. Does -- I guess I'm</p> <p>16 confused by when you say "develop and enforce safety</p> <p>17 policies." Are there specific things that SCP wants to</p> <p>18 see in those policies?</p> <p>19 A. In those policies we're looking for things</p> <p>20 like how do we prevent the proliferation of these</p> <p>21 images. You know, this New York Times article points to</p> <p>22 a few years ago there being 45 million images and videos</p> <p>23 being reported from these companies. We know the</p> <p>24 numbers are much higher than that. It's a real problem.</p> <p>25 We don't have enough law enforcement to</p>

<p>30</p> <p>1 handle the issue. We don't have enough people in 2 industry to do it. We certainly don't have enough 3 people at an organization like mine or others to be able 4 to fully prevent this from happening. 5 Every one of these images is a child 6 being exploited and abused; and every time that image is 7 shared, a child is re-victimized. What we try to do is 8 bring really smart people and technical people together 9 to say: What can we do to monitor this, to prevent it, 10 and to get rid of it? 11 Q. And just to clarify -- these may be double 12 questions; they may not be -- but when we're talking 13 about these images and material, are you referring to 14 child sexual abuse material? 15 A. Correct. 16 Q. And is that abbreviated with the acronym CSAM? 17 A. It is. 18 Q. And is that an acronym that SCP came up with? 19 A. No. 20 Q. Okay. Is this an acronym that's generally 21 recognized in the law enforcement world? 22 A. Yes. 23 Q. Okay. Is CSAM illegal? 24 MR. DISHER: Objection, vague -- or 25 excuse me. Objection, form. Sorry.</p>	<p>32</p> <p>1 gaming devices different filters to allow for parental 2 controls, to allow for, you know, opportunities for 3 education, for -- for just the ability for parents to 4 have more control and more -- better understanding of 5 what their children are doing when they are online. 6 Q. The private moderation and filtering 7 technologies that are currently being utilized, do you 8 believe that those technologies are sufficient? 9 MR. DISHER: Objection, form. 10 A. I think there's always more that can be done 11 to protect children. 12 Q. (BY MR. WALTON) How good of a job do you 13 think those current technologies are doing to protect 14 children today? 15 MR. DISHER: Objection. Objection, form. 16 A. I think without them, we'd see an even worse 17 problem of child predation online. 18 Q. (BY MR. WALTON) That second sentence there 19 says that, "In order to detect CSAM, as well as to 20 report it to authorities, online companies must develop 21 and use advanced algorithms and other screening tools." 22 Is CS- -- is SCP -- I'm using way too many acronyms here 23 today. Is SCP involved in developing advanced 24 algorithms and other screening tools? 25 MR. DISHER: Objection, form.</p>
<p>31</p> <p>1 A. Yes. 2 Q. (BY MR. WALTON) Okay. I just wanted to 3 clarify, you know. If there's any CSAM out there that's 4 actually not illegal, you know, we should talk about 5 that. 6 And, there again, just to try to be 7 clear, does SCP advocate the removal of all CSAM from 8 internet websites? 9 A. Yes. 10 Q. Gotcha. Okay. Let's skip down to 11 Paragraph 7, which is at the top of page 4 in my 12 document. Are you able to see Paragraph 7 of your 13 declaration, Ms. Rumenap? 14 A. Yes. 15 Q. And I think you alluded to this earlier in one 16 of your answers, but you mentioned the government's 17 limited resources. You say that these -- let me just 18 read the first sentence, and then I'll ask you about it. 19 "The government's limited resources underscore the 20 critical importance of private moderation and filtering 21 technologies." What are private moderation and 22 filtering technologies? 23 A. So different companies have different -- 24 different capabilities, different technologies. You can 25 have on your phone or your laptop or your, you know,</p>	<p>33</p> <p>1 A. We are not engineers or computer scientists 2 who can develop algorithms; but we have worked hand in 3 hand, we have seen firsthand these companies work with 4 law enforcement, with child safety organizations to try 5 and better understand the problems in an effort to try 6 and prevent the problem. 7 Q. (BY MR. WALTON) What do you mean by "other 8 screening tools"? 9 A. So, look, it's more than just child sexual 10 abuse images. That is fairly straightforward. But 11 there are other issues and tactics that predators use, 12 things like grooming, things like luring, you know, age 13 detection. You know, you see in chat rooms these 14 predators. They're savvy and they're keeping up with 15 what the laws and what the rules are. They're keeping 16 up with what the companies are doing. 17 And it's why it's so important to have 18 the partnership, to look ahead and try to figure out the 19 best way to remove these images and to prevent these 20 crimes from happening and to make sure that we have 21 tough penalties when the crime does happen, as a 22 deterrent. It's much more difficult to catch and 23 monitor luring and grooming crimes, especially if it's 24 someone lying about their age, lying about who they are. 25 Q. So when private companies are able to gather</p>

<p style="text-align: right;">34</p> <p>1 information like this, do you believe that that</p> <p>2 information can be passed on to law enforcement?</p> <p>3 MR. DISHER: Objection, form.</p> <p>4 A. We know that they pass that information on to</p> <p>5 law enforcement.</p> <p>6 Q. (BY MR. WALTON) Is that a good thing?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Let's go to Paragraph 8. And here's</p> <p>9 where we start getting into HB 20. It says that, in</p> <p>10 Paragraph 8 of your declaration, "If House Bill 20 is</p> <p>11 allowed to go into effect, we are concerned it will be</p> <p>12 harder to remove objectionable content online and to</p> <p>13 keep children safe online." What do you mean when you</p> <p>14 say "we are concerned"?</p> <p>15 A. Well, we are confident that HB 20 injects</p> <p>16 questions. It's very vague, and we are very concerned</p> <p>17 that -- there are just concerns of how platforms could</p> <p>18 monitor the content if this bill were to go into effect.</p> <p>19 Q. When you say that you have a concern about</p> <p>20 something being vague, what specifically do you believe</p> <p>21 is vague?</p> <p>22 A. I think the bill is vague on the role of what</p> <p>23 these platforms would need to do.</p> <p>24 Q. How do you believe HB 20 would make it harder</p> <p>25 to remove objectionable content?</p>	<p style="text-align: right;">36</p> <p>1 A. I think that this law as written, the intent</p> <p>2 is good; but it is too vague. And I just don't think</p> <p>3 that these companies could comply and that it would be</p> <p>4 enforceable and it would -- it could cause real problems</p> <p>5 to safety and to more children being harmed.</p> <p>6 Q. (BY MR. WALTON) Have you had any</p> <p>7 conversations with social media platforms regarding how</p> <p>8 they would or would not change their practices if HB 20</p> <p>9 went into effect?</p> <p>10 MR. DISHER: Objection, form.</p> <p>11 A. I have not.</p> <p>12 Q. (BY MR. WALTON) Have you had any</p> <p>13 conversations with e-mail service providers regarding</p> <p>14 how they may or may not change their practices were they</p> <p>15 required to comply with HB 20?</p> <p>16 A. I have not.</p> <p>17 Q. Okay. Let's go down to Paragraph 10. The</p> <p>18 first sentence in Paragraph 10 says, "Similarly, HB 20's</p> <p>19 disclosure requirements give child predators a roadmap</p> <p>20 to escape detection." What does that mean?</p> <p>21 A. It's my experience, especially working closely</p> <p>22 with law enforcement, that predators are savvy. They</p> <p>23 know about technology. They know what laws are being</p> <p>24 passed. They share information about how to try to get</p> <p>25 around detection in an effort to post images and to</p>
<p style="text-align: right;">35</p> <p>1 A. I'm sorry. Can you repeat the question?</p> <p>2 Q. Yeah, sure. How do you believe that HB 20</p> <p>3 will make it harder to remove objectionable content</p> <p>4 online?</p> <p>5 A. I'm concerned that what it would do is it</p> <p>6 would require groups like mine to be responsible for</p> <p>7 reporting. It would restrict and prohibit these</p> <p>8 companies from removing content. I'd be concerned</p> <p>9 there'd be a fear, that they would be afraid of</p> <p>10 lawsuits themselves and that, as a result, they</p> <p>11 wouldn't be able to sufficiently monitor.</p> <p>12 You know, look, they monitor. I think</p> <p>13 they do a lot of good. I think they could still be</p> <p>14 doing more. The problem is just so prevalent,</p> <p>15 they're -- they're -- you could spend, you know, teams</p> <p>16 and teams and teams of people to be looking for this</p> <p>17 objectionable content and trying to remove it; and it</p> <p>18 still wouldn't be enough.</p> <p>19 Q. What are your concerns based on? What I mean</p> <p>20 by that is, if you're concerned that social media</p> <p>21 platforms, these internet companies, you know, would</p> <p>22 stop what they're currently doing or diminish what</p> <p>23 they're currently doing to monitor objectionable</p> <p>24 content, why do you believe that?</p> <p>25 MR. DISHER: Objection, form.</p>	<p style="text-align: right;">37</p> <p>1 reach children; and I worry with these disclosure</p> <p>2 requirements that any information we'd be requiring</p> <p>3 these companies to put out is just another roadmap,</p> <p>4 another tool that these predators would have to be able</p> <p>5 to get around detection.</p> <p>6 Q. I'm assuming that you've read the disclosure</p> <p>7 requirements that HB 20 lays out --</p> <p>8 A. Yes.</p> <p>9 Q. -- is that fair?</p> <p>10 A. Yes.</p> <p>11 Q. What is it about the material that HB 20</p> <p>12 would require internet companies to disclose that you</p> <p>13 are concerned about?</p> <p>14 MR. DISHER: Objection, form.</p> <p>15 A. I worry that it ties the companies' hands. I</p> <p>16 think anytime you're asking them to put out information,</p> <p>17 all except maybe the very specific algorithm they use to</p> <p>18 detect such images, the more information they make</p> <p>19 available to the general public, the people who are</p> <p>20 already trying to do children harm, the worse off that</p> <p>21 children and families are.</p> <p>22 Q. (BY MR. WALTON) Are you able to give me an</p> <p>23 example of the specific type of information that a</p> <p>24 predator would use to escape detection in specific</p> <p>25 circumstances?</p>

<p>38</p> <p>1 MR. DISHER: Objection, form.</p> <p>2 A. I can tell you a story about 2008, 2009, when</p> <p>3 we were first launching Stop Internet Predators, which</p> <p>4 is a project to stop child predators, really was</p> <p>5 focusing our efforts around internet safety; and one of</p> <p>6 the main concerns that we had then was Google Street</p> <p>7 View. Google Street View, when it first came out, was a</p> <p>8 very cool, innovative technology to allow people to</p> <p>9 really see the whole world, right, street by street,</p> <p>10 house by house.</p> <p>11 What it did not do is cover or blur or in</p> <p>12 any way, in the early version, any photos of children,</p> <p>13 of families, someone getting out of their car, license</p> <p>14 plate numbers. It did not -- a swing set in someone's</p> <p>15 backyard, a homeless shelter, or a rape counseling</p> <p>16 center, a child -- children's advocacy center, any of</p> <p>17 these types of places were all put out for anyone to</p> <p>18 see.</p> <p>19 What we were very concerned about at the</p> <p>20 time is with very basic Google searches, you could look</p> <p>21 out on Google, look out on Facebook, kids are putting</p> <p>22 information out there about themselves; and someone who</p> <p>23 was savvy could take their picture, could take their</p> <p>24 address, could find things -- maybe they had posted</p> <p>25 something for sale on Craigslist; maybe they had</p>	<p>40</p> <p>1 A. I think any kind of disclosure requirements</p> <p>2 that are going to make it easier for a bad actor to</p> <p>3 commit a bad act is something that we should be getting</p> <p>4 away from.</p> <p>5 Q (BY MR. WALTON) Gotcha. Okay. So how does</p> <p>6 the information that HB 20 requires be disclosed, how</p> <p>7 does that help a bad actor?</p> <p>8 MR. DISHER: Objection, form.</p> <p>9 Go ahead and answer.</p> <p>10 A. Bad actors are trying to circumvent the</p> <p>11 process and trying to circumvent detection every chance</p> <p>12 they get. Any kind of bill, whether it's HB 20 or some</p> <p>13 other bill that is going to force the hands of the</p> <p>14 platforms of the technology companies to talk publicly</p> <p>15 or disclose any kind of information about the inner</p> <p>16 workings of how they create these algorithms and what</p> <p>17 they do to try to combat this problem is giving a hand</p> <p>18 up to the predators.</p> <p>19 Q. (BY MR. WALTON) The -- so I -- let me back</p> <p>20 up. And there are -- let's see if we can do it this</p> <p>21 way. There are certain social media platforms that</p> <p>22 disclose, at least to their users, a certain amount of</p> <p>23 information about the way they collect and moderate</p> <p>24 their content. Would you agree with that?</p> <p>25 MR. DISHER: Objection, form.</p>
<p>39</p> <p>1 something about a vacation on Facebook, harmless</p> <p>2 information. But when all that information, all of that</p> <p>3 data is collected by the wrong person, we were very</p> <p>4 concerned that a predator could take that information</p> <p>5 and literally pinpoint where that child lived in the</p> <p>6 house, where that child went to school, at least with</p> <p>7 some very best guesses, how they got to school, the time</p> <p>8 of day, maybe, when their parents came home from work.</p> <p>9 When you are talking about so many</p> <p>10 millions and millions of data points out for anyone to</p> <p>11 be able to see, people who are trying to harm children,</p> <p>12 these bad actors, they will stop at nothing to try and</p> <p>13 get the information and figure out a way just around</p> <p>14 detection.</p> <p>15 Q. Yeah. So if I'm understanding you correctly,</p> <p>16 that example you described was an example of how if</p> <p>17 predators are able to have access to specific</p> <p>18 information, they can put the pieces of the puzzle</p> <p>19 together in order to harm people. My question was more</p> <p>20 specifically about the disclosure requirements of HB 20.</p> <p>21 So if a social media platform were to</p> <p>22 disclose what HB 20 requires them to disclose, how would</p> <p>23 that specific technical information enable a predator to</p> <p>24 escape detection?</p> <p>25 MR. DISHER: Objection, form.</p>	<p>41</p> <p>1 A. I'm not sure how that fits into HB 20 or the</p> <p>2 declaration that I have drafted.</p> <p>3 Q. (BY MR. WALTON) Sure. I'm just -- I'm trying</p> <p>4 to understand -- there are -- there are some of the ways</p> <p>5 in which social media platforms moderate content that</p> <p>6 they have affirmatively decided to disclose to their</p> <p>7 users. Are you familiar with that?</p> <p>8 MR. DISHER: Objection, form.</p> <p>9 A. What type of information are you asking about?</p> <p>10 Q (BY MR. WALTONJ) Well, just generally, are</p> <p>11 you familiar with any social media platforms that give</p> <p>12 disclosures to their users about how they moderate and</p> <p>13 use content that their users decide to post on their</p> <p>14 platform?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Do you believe that there's anything in</p> <p>17 what is currently being disclosed that is too much, that</p> <p>18 helps enable predators to escape detection?</p> <p>19 MR. DISHER: Objection, form.</p> <p>20 A. I don't know that I have an opinion on that.</p> <p>21 Q (BY MR. WALTON) Okay. Paragraph 11, the</p> <p>22 first sentence there says, "Likewise, HB 20's onerous</p> <p>23 obligations for account and content removal will likely</p> <p>24 cause online platforms to moderate less aggressively."</p> <p>25 What is your basis for saying that?</p>

<p style="text-align: right;">42</p> <p>1 A. If you are -- I think if you are asking these</p> <p>2 companies to -- to not moderate content, that we are</p> <p>3 opening ourselves up to more illicit material becoming</p> <p>4 available online. I want these companies to do more to</p> <p>5 block this type of content. I think they do a lot. I</p> <p>6 think they could do more. I don't know exactly what</p> <p>7 more they could do, but I think they could do more.</p> <p>8 Q. Have you -- maybe this will help provide some</p> <p>9 clarity here: Have you had any discussion with</p> <p>10 companies that offer social media platforms regarding</p> <p>11 what they would or wouldn't do if HB 20 went into</p> <p>12 effect?</p> <p>13 MR. DISHER: Objection, form.</p> <p>14 A. No.</p> <p>15 MR. WALTON: Okay. Let's see. We've</p> <p>16 been going for almost an hour. How about we go ahead</p> <p>17 and take a ten-minute break?</p> <p>18 MR. DISHER: Sure. That's fine.</p> <p>19 THE REPORTER: We're going off the record</p> <p>20 at 12:56 p.m.</p> <p>21 (Off the record from 12:56 to 1:10 p.m.)</p> <p>22 THE REPORTER: We're back on the record</p> <p>23 at 1:10 p.m.</p> <p>24 Q (BY MR. WALTON) Ms. Rumenap, we are back</p> <p>25 after a brief break. Are you ready to proceed with your</p>	<p style="text-align: right;">44</p> <p>1 when they were exploited, to be able to share those</p> <p>2 stories with social media companies for them to</p> <p>3 understand the problem and to be part of coming up with</p> <p>4 a solution.</p> <p>5 Q. Was SCP involved in developing any algorithms</p> <p>6 as part of those efforts?</p> <p>7 A. No.</p> <p>8 MR. DISHER: Ob- -- never mind. Go</p> <p>9 ahead.</p> <p>10 Q. (BY MR. WALTON) And when you say in the last</p> <p>11 phrase there, "the covered 'social media platforms,'"</p> <p>12 what are you referring to?</p> <p>13 A. Major internet companies.</p> <p>14 Q. Can you give any examples?</p> <p>15 A. Facebook.</p> <p>16 Q. Any other social media platforms?</p> <p>17 A. We have worked a lot with local schools on</p> <p>18 their -- even on their websites and blogs over the</p> <p>19 years. People don't always think of a local school blog</p> <p>20 or a PTO page as being a social media site; but if users</p> <p>21 are generating content and photos of kids and activities</p> <p>22 and updates about the school are being generated by</p> <p>23 parents and by staff, we consider those to be social</p> <p>24 media platforms. They certainly don't have the users</p> <p>25 that a Facebook or Instagram would have, but they</p>
<p style="text-align: right;">43</p> <p>1 deposition?</p> <p>2 A. I am.</p> <p>3 Q. All right. I believe we had left off around</p> <p>4 Paragraph 11 or 12 in walking through your declaration.</p> <p>5 Let me ask you a question that's not</p> <p>6 explicitly related to Paragraph 12. Are you aware,</p> <p>7 generally, that HB 20 permits social media platforms to</p> <p>8 sensor material that is illegal?</p> <p>9 MR. DISHER: Objection, form.</p> <p>10 A. Yes.</p> <p>11 Q (BY MR. WALTON) Okay. Going to Paragraph 15,</p> <p>12 I'm now on the last page of your declaration.</p> <p>13 Oh, oops. I got ahead of myself.</p> <p>14 Paragraph 14 -- sorry -- still on the last page. You</p> <p>15 refer to "programatic efforts we have helped develop."</p> <p>16 What are those?</p> <p>17 A. Primarily, we have worked with social media</p> <p>18 companies with their government affairs teams, some with</p> <p>19 their engineers, to better understand algorithms and</p> <p>20 what processes are in place to be able to detect and</p> <p>21 prevent this proliferation of sexual abuse images of</p> <p>22 children. What we have done is we have worked with</p> <p>23 advocates and victims and parents of victims to really</p> <p>24 do a deep dive of how their stories came to be, what</p> <p>25 types of pitfalls did their children find themselves in</p>	<p style="text-align: right;">45</p> <p>1 certainly do have users. And so we have worked over the</p> <p>2 years with PTOs and a couple of schools to try to just</p> <p>3 be more mindful about the type of information that's</p> <p>4 being posted on these platforms, with an eye, really, to</p> <p>5 the privacy of the students.</p> <p>6 Q. For any of those websites or platforms that</p> <p>7 are related to local schools, are you aware of any of</p> <p>8 those sites that have 50 million active users per month?</p> <p>9 MR. DISHER: Objection, form.</p> <p>10 Q. (BY MR. WALTON) I'm sorry. What was your</p> <p>11 answer?</p> <p>12 A. No.</p> <p>13 Q. Okay. That's what I thought.</p> <p>14 Okay. Let's go now to Paragraph 15. I</p> <p>15 got ahead of myself earlier. This paragraph says, "We</p> <p>16 are concerned that the threat of countless lawsuits will</p> <p>17 lead to under-enforcement of such policies." What is</p> <p>18 the basis for that concern?</p> <p>19 A. If you are tying the hands of these companies</p> <p>20 in what they can and cannot moderate, our concern is</p> <p>21 that the proliferation of child sexual abuse images will</p> <p>22 be confounded; and as a result, families and individuals</p> <p>23 and victims and others will sue the companies as part of</p> <p>24 that. And we want the companies to be able to do</p> <p>25 everything they absolutely can to try to take down such</p>

<p style="text-align: right;">46</p> <p>1 content and not restrict them in any way or in some way</p> <p>2 make it -- make it easier for -- "easier" may not be the</p> <p>3 right word -- make it more difficult for them to be able</p> <p>4 to be a part of the solution.</p> <p>5 Q. Are you aware of anyone who intends to bring a</p> <p>6 lawsuit under HB 20?</p> <p>7 MR. DISHER: Objection, form.</p> <p>8 A. I do not.</p> <p>9 Q. (BY MR. WALTON) Are you aware of anyone that</p> <p>10 would bring a lawsuit against a social media platform</p> <p>11 for censoring CSAM?</p> <p>12 MR. DISHER: Objection, form.</p> <p>13 A. I do not.</p> <p>14 Q. (BY MR. WALTON) You mentioned that you have</p> <p>15 submitted a declaration in the Florida lawsuit; is that</p> <p>16 correct?</p> <p>17 A. Yes.</p> <p>18 Q. How does -- well, does this declaration differ</p> <p>19 from the Florida declaration?</p> <p>20 MR. DISHER: Objection, form.</p> <p>21 A. It's similar.</p> <p>22 Q. (BY MR. WALTON) Similar. So I'm assuming,</p> <p>23 you know, it would have a different date and so forth on</p> <p>24 it; but as far as the substance, do you recall any</p> <p>25 substantive differences in your two declarations?</p>	<p style="text-align: right;">48</p> <p>1 positions called?</p> <p>2 A. We have an advisory board. We also have a</p> <p>3 board of directors; and then, on occasion, we have a</p> <p>4 research fellow.</p> <p>5 Q. Have you discussed with the advisory board</p> <p>6 HB 20?</p> <p>7 A. Yes.</p> <p>8 Q. What does the advisory board think about</p> <p>9 HB 20?</p> <p>10 MR. DISHER: Objection, form.</p> <p>11 (Simultaneous speakers.)</p> <p>12 THE WITNESS: Sorry, Todd.</p> <p>13 Q. (BY MR. WALTON) I'm sorry. I didn't hear</p> <p>14 your answer.</p> <p>15 A. They are in agreement with the declaration.</p> <p>16 Q. Okay. So they are aware that you submitted</p> <p>17 this declaration then?</p> <p>18 A. Yes.</p> <p>19 Q. Other than the advisory board, did you talk to</p> <p>20 anybody else at SCP about HB 20?</p> <p>21 A. No.</p> <p>22 Q. What about your declaration in the Florida</p> <p>23 lawsuit, did you talk to the advisory board about that</p> <p>24 declaration as well?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">47</p> <p>1 A. No.</p> <p>2 Q. Okay. Have you had discussions with anyone --</p> <p>3 and I'm not asking for discussions with your attorney,</p> <p>4 okay? So let's set aside attorney-client discussions.</p> <p>5 But anyone who's not your attorney, have you had</p> <p>6 discussions with them about the substance of the Florida</p> <p>7 law?</p> <p>8 A. No.</p> <p>9 Q. And then the same thing for HB 20. Here in</p> <p>10 Texas, have you had discussions with anyone other than</p> <p>11 your attorney about the substance of HB 20?</p> <p>12 A. I've had very minimal conversation about it</p> <p>13 when we were writing the -- after we drafted the</p> <p>14 declaration, to make sure that it was submitted, but not</p> <p>15 a substantive conversation outside of what I have</p> <p>16 included in the declaration.</p> <p>17 Q. Gotcha. So your job title, your position</p> <p>18 title, is President of SCP, right?</p> <p>19 A. Right.</p> <p>20 Q. Okay. Does SCP have any other -- I don't know</p> <p>21 what you would call them -- officers, directors, board</p> <p>22 members, executive directors, anything like that?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. I guess describe for me a little bit</p> <p>25 the chain there, the setup. What are those other</p>	<p style="text-align: right;">49</p> <p>1 Q. And were they in support of you providing that</p> <p>2 declaration in the Florida lawsuit?</p> <p>3 A. Yes.</p> <p>4 Q. Did they have a chance to review or comment on</p> <p>5 your declaration in the Florida lawsuit before you</p> <p>6 signed it?</p> <p>7 A. No.</p> <p>8 Q. And did they have a chance to review or</p> <p>9 comment on your declaration in this case before you</p> <p>10 signed it?</p> <p>11 A. No.</p> <p>12 Q. Why is SCP not a plaintiff in this case?</p> <p>13 MR. DISHER: Objection, form.</p> <p>14 A. We're not a plaintiff simply because we just</p> <p>15 don't have the staff and the resources to take on a big</p> <p>16 lawsuit. This was a way for us to get engaged and be</p> <p>17 involved in the process and have our opinions known and</p> <p>18 heard, but we just simply don't have the resources to be</p> <p>19 able to file a lawsuit.</p> <p>20 Q. (BY MR. WALTON) And if I ask you why you were</p> <p>21 not a plaintiff in the Florida lawsuit, would your</p> <p>22 answer be the same?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. I thought so.</p> <p>25 We talked earlier about CSAM. Are there</p>

<p>50</p> <p>1 any other types of content that SCP believes would be 2 appropriate for social media platforms to flag and/or 3 remove?</p> <p>4 MR. DISHER: Objection, form. 5 Go ahead and answer.</p> <p>6 A. Our organization focuses strictly on 7 prevention of child exploitation. We do not take an 8 opinion on other types of illicit material.</p> <p>9 Q. (BY MR. WALTON) What information does a 10 person, an individual, provide to a social media 11 platform when they set up a user account?</p> <p>12 MR. DISHER: Objection, form.</p> <p>13 A. So it depends on if it's a child or someone 14 who's over the age of 18 what information is required of 15 them. I couldn't tell you exactly every piece of 16 information for every social media company that someone 17 has to provide, but typically it is basic information 18 about the person that they can verify they are an actual 19 person.</p> <p>20 Q. (BY MR. WALTON) Do you believe that it's 21 appropriate to have different requirements for a minor 22 to set up a social media account?</p> <p>23 MR. DISHER: Objection, form.</p> <p>24 A. I do.</p> <p>25 Q. (BY MR. WALTON) And why is that?</p>	<p>52</p> <p>1 EXAMINATION</p> <p>2 BY MR. DISHER:</p> <p>3 Q. Ms. Rumenap, I just have a few questions for 4 you to clarify some things that I heard.</p> <p>5 The first thing is in your prior 6 testimony, I heard you make a statement that, "The 7 intent was good." Now, I want to just clarify for the 8 record, when you said, "The intent was good," were you 9 referring to what you think the intent of HB 20, as a 10 whole, is or what the intent of the specific carveout 11 regarding referrals from agencies like yours is?</p> <p>12 A. Thank you for allowing me to clarify that. I 13 was referencing the intent of the carveout. The intent 14 of the bill holistically, I do not agree with. I do 15 agree with the intent of the carveout for allowing 16 groups like mine to be able to report and flag and 17 monitor child sexual abuse images. I think that intent 18 is good, but that carveout simply doesn't go far enough.</p> <p>19 Q. Okay. Thank you.</p> <p>20 Now, my last question is regarding CSAM.</p> <p>21 You have also mentioned material that is, you know, 22 intended to be grooming or somehow other -- you know, in 23 another way predatory towards children. Would that type 24 of material fall under CSAM, or is that separate from 25 CSAM?</p>
<p>51</p> <p>1 MR. DISHER: Objection, form.</p> <p>2 A. Minors' brains just simply haven't developed 3 the way that they do as an adult. They're not 4 completely cognizant of decisions that they're making, 5 and they don't always do the right thing or know the 6 right thing to do or to say. When we are talking about 7 internet platforms, it's very easy for someone to say or 8 do things, put information out there about themselves 9 that they might not actually say to someone's face, say 10 or do in front of someone. And when you're talking 11 about minors, they sometimes just don't know right from 12 wrong. They don't always make the best decisions; and 13 so restricting some of their access and information that 14 is required or asked of them to make available is a good 15 thing in helping to keep them safe.</p> <p>16 Q. (BY MR. WALTON) Okay. Sorry. I'm just 17 looking through my notes here to see if I missed 18 something.</p> <p>19 All right. Well, those are all the 20 questions I have at this time.</p> <p>21 MR. WALTON: So I will go ahead and pass 22 the witness.</p> <p>23 MR. DISHER: All right.</p> <p>24 *</p> <p>25 *</p>	<p>53</p> <p>1 A. It is separate from CSAM.</p> <p>2 Q. Okay. Thank you. Thank you for those 3 clarifications.</p> <p>4 MR. DISHER: I have nothing further.</p> <p>5 FURTHER EXAMINATION</p> <p>6 BY MR. WALTON:</p> <p>7 Q. When you were talking with Mr. Disher about 8 the carveout in terms of your reference to the intent, 9 just for clarification, were you talking about the 10 exception that is contained in -- well, what will be 11 codified as the Texas Commerce Code, Business Commerce 12 Code, Chapter 143A.006(a)(2)?</p> <p>13 MR. WALTON: Do I need to throw it up, 14 Todd?</p> <p>15 MR. DISHER: Yes. Thank you.</p> <p>16 MR. WALTON: All right. Just hold on. 17 Just give me a second.</p> <p>18 Okay. I've just sent through the chat 19 box a PDF file labeled HB 20, if the court reporter 20 could note that that will be Exhibit 2 to this 21 deposition.</p> <p>22 (Exhibit 2 marked.)</p> <p>23 Q. (BY MR. WALTON) And, Ms. Rumenap, just let me 24 know when you're able to open that document.</p> <p>25 A. I have it opened.</p>

<p>54</p> <p>1 Q. All right. Let me find the specific section 2 to which we are referring. 3 Okay. In the PDF that I sent, Exhibit 2, 4 it should be on the twelfth page in that PDF document, 5 towards the bottom of page 12. Do you see Line Number 6 17? 7 A. Line 17, yes. 8 Q. Okay. And that Line 17 starts out with a 9 section number; and the section number is 143A.006, 10 correct? 11 A. Correct. 12 Q. And so what -- I believe what you and 13 Mr. Disher were talking about was Section (a)(2), which 14 is just -- begins on Line 22; and so I just wanted to 15 clarify that for the record. Is that the specific 16 carveout that you say you approve the intent behind that 17 carveout? 18 A. That is correct. 19 Q. Okay. And in the other question, Mr. Disher 20 asked you about CSAM and there being other illicit 21 material. Okay. How would you describe that other 22 material that falls outside the scope of CSAM? 23 MR. DISHER: Objection, form. 24 But go ahead and answer. 25 A. Well, it's nuanced; and it's hard to explain</p>	<p>56</p> <p>1 trunk, kept her chained to a bed in his apartment for 2 days upon days. He was posting photos of her of 3 terrible, terrible sex acts that he was committing 4 against her. He was having friends come in and do the 5 same thing, and he was videotaping it and posting it. 6 And someone in an underground chat was so 7 disturbed by what was happening to this young girl, they 8 anonymously made a tip to the FBI; and the FBI was able 9 to go in and rescue her. When they walked into the room 10 she was so petrified and she had been so traumatized 11 that she was hiding under the bed with a dog chain 12 around her neck and as far as she could go was under the 13 bed to try to get away from whom she thought was a 14 perpetrator. It was the FBI. They were able to rescue 15 her. It took quite some time to convince her to even 16 come out, to get her out of that house, and then arrest 17 the perpetrator. 18 That is hard to describe. That is hard 19 to police and monitor and report. When it started, the 20 conversation between Alicia and this person, she thought 21 she was talking to an 18-year-old boy who was expressing 22 some interest in her. He convinced her to send pictures 23 of her. He was telling her how beautiful she was. She 24 wasn't getting this attention from somewhere else, and 25 she sought it from someone she didn't know.</p>
<p>55</p> <p>1 or hard to see. Typically, this is luring or grooming 2 of a child that can take place over days, weeks, months, 3 years sometimes. 4 We worked with a young woman out of 5 Pennsylvania, Alicia Kozakiewicz. I don't know if 6 you've ever heard of her story, but she was one of the 7 very first stories to make national attention around a 8 young girl being online, talking to a stranger, someone 9 she thought she knew, someone who lied to her about who 10 she [sic] was; and she agreed to meet him. Having 11 chatted with him online, she agreed to meet him in 12 person. And she, fortunately, thanks to the FBI, was 13 rescued but, by all accounts, should have never -- 14 should have never made it. 15 This is someone who she thought she knew, 16 she had spent quite a bit of time talking to; and when 17 she went to meet him, she said she knew immediately -- 18 she was 14 years old at the time -- that she new 19 immediately, as she got closer to the car, that the 20 person was not who she had thought he was. She thought 21 she was talking to an 18-year-old boy, at 14. 22 This guy was in his mid 30s and not a 23 good person; and as she turned to run, to try to run 24 back to her house -- she was in her own neighborhood 25 when she met him -- he grabbed her, threw her in the</p>	<p>57</p> <p>1 That's what goes back to -- not all kids, 2 of course; certainly not all adults are bad -- but kids 3 do and say and post things that they don't necessarily 4 understand what they're doing or saying or who they're 5 even talking to when they're talking online. 6 And so when we're talking about that, 7 this is a story of a young girl who was groomed, was 8 lured into meeting him in person, and is sort of the 9 worst-case scenario. She was abducted. She was raped 10 repeatedly. She was really left for dead had it not 11 been for someone so disgusted by what was happening to 12 actually report the person. That's the type of thing we 13 are trying to prevent. 14 And we want to make sure that victims 15 have a seat at the table to tell their story so it 16 doesn't happen to another person, that law enforcement 17 has every resource at their disposal, so advocacy groups 18 like mine can try to come up with solutions. And 19 internet companies can be part of the problem because 20 without all of us involved in the process, kids are the 21 ones who will lose out; and they are the ones who are 22 harmed. 23 Q. (BY MR. WALTON) Those grooming activities 24 through social media that took place, those were 25 illegal, right?</p>

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1 MR. DISHER: Objection, form.

2 Go ahead.

3 A. At the time when that happened, there were no
4 laws on the books to actually define what luring or
5 grooming online was.

6 Q. (BY MR. WALTON) Do those laws exist today?

7 A. Yes.

8 MR. WALTON: Pass the witness.

9 MR. DISHER: I have nothing further.

10 Thank you for your time.

11 THE REPORTER: Mr. Disher, do you need --

12 MR. WALTON: We can go off the record.

13 THE REPORTER: Do you need an expedited
14 copy of the transcript as well?

15 MR. DISHER: Yes, ma'am.

16 THE REPORTER: Okay. This concludes the
17 deposition at 1:35 p.m.

18 (Deposition adjourned at 1:35 p.m.)

19 (Signature not requested.)

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1 STATE OF TEXAS)

2 REPORTER'S CERTIFICATION

3 I, DEBBIE D. CUNNINGHAM, CSR, hereby certify
4 that the witness was duly sworn and that this transcript
5 is a true record of the testimony given by the witness.

6 I further certify that I am neither counsel
7 for, related to, nor employed by any of the parties or
8 attorneys in the action in which this proceeding was
9 taken. Further, I am not a relative or employee of any
10 attorney of record in this cause, nor am I financially
11 or otherwise interested in the outcome of the action.

12 I further certify that pursuant to FRCP
13 Rule 30(f)(1) that the signature of the deponent was not
14 requested by the deponent or a party before the
15 completion of the deposition.

16 Subscribed and sworn to by me this day,
17 November 14, 2021.

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Debbie D. Cunningham, CSR

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